

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLEN ROBINSON,)
Plaintiff,) Case No. 23 C 02724
v.) Hon. Judge Martha M. Pacold
WAYNE FRANO, *et al.*,) District Judge
Defendants.) Mag. Judge Heather K. McShain
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**JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE
FACT DISCOVERY**

Plaintiff and Defendants jointly move this Court for an extension of the current fact discovery deadline by three months, and in support thereof states as follows:

1. Fact discovery is set to close in this matter on August 1, 2025. Dkt. 126.
2. The Parties have been working cooperatively in an effort to complete discovery, but much remains to be done. In addition, the lawyer at Loevy & Loevy who had primary responsibility for litigating this case recently left the firm, and one of the lawyers for the Individual Defendants who has the primary responsibility for litigating the case is currently on paternity leave. The Parties therefore agree that a fact discovery extension is necessary and jointly propose a new deadline of November 1, 2025. The Parties are confident that this extension will allow them to complete the remaining discovery.
3. Since the last Joint Status Report (Dkt. 138), the parties have continued actively engaging in fact discovery.

4. The parties completed several depositions since filing the most recent Joint Status Report. Specifically, Allen Robinson III was deposed on June 9, 2025. Shanice Robinson was deposed on June 17, 2025, and Quinton Davis was deposed on June 27, 2025. ASA Carter is set to be deposed on July 17, 2025. The parties have tentatively agreed to schedule Plaintiff's deposition on August 20, 2025.

5. The Parties are working cooperatively to schedule the following depositions:

- Oscar Russell
- Jodi Garvey
- Alanae Robinson
- ASA Melissa Meana Hartman
- Defendant Officer Celio
- Defendant Officer McDermott
- Defendant Officer Folino
- Defendant Officer Zelig
- Defendant Babich
- Defendant Officer Conroy
- Defendant Officer Brasic
- Darrick Stidwell
- Jenee Moreland

6. There are two other primary issues that the parties are currently working on beyond depositions. First, the Court ordered Plaintiff to produce hundreds of recorded telephone calls. Dkt. 115. The production and review of those recordings has taken a significant amount of time. Plaintiff also served written discovery on Defendants relating to those calls. Defendants

have now responded to those requests, and Plaintiff is reviewing those responses to determine whether the parties need to meet and confer about any issues. Plaintiff is also working to confirm that all of the recordings have been produced given an apparent discrepancy in the number of recorded calls.¹

7. Second, the Court recently denied the City of Chicago's motion to bifurcate *Monell* discovery. Plaintiff and the City of Chicago are currently conferring about the scope of *Monell* discovery and about whether the *Watts* CRs may be produced in this case. Given the conversations thus far, the parties are hopeful that they will be able to reach agreement, but they have not finalized those conversations yet.

8. Given the numerous pending depositions, many of which involve key fact witnesses, the need for coordination on service, unresolved discovery issues, and outstanding written discovery relating to the telephone recordings, the Parties respectfully request an extension of the fact discovery deadline through and including November 1, 2025.

9. This extension is necessary to complete these tasks diligently and fairly and is not sought for the purpose of delay.

Conclusion

For the reasons stated above, the Parties respectfully requests that the Court enter an order extending the deadline for fact discovery through November 1, 2025.

¹ Plaintiff believes that there may have been a significant number of duplicate files that originally appeared to be unique recordings, but counsel is still working to confirm whether this is the case.

Respectfully submitted,

/s/ Scott Rauscher
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